

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

Case No. 23-cv-10017

v.

Honorable Shalina D. Kumar

NEIL S. CHANDRAN, et al.,

Defendants.

_____ /

**STIPULATION TO EXTEND ANSWER DEADLINE AS TO
DEFENDANTS NEIL CHANDRAN AND GARRY DAVIDSON**

Plaintiff, Securities and Exchange Commission (“SEC”), hereby stipulates as follows:

SUMMARY

1. Defendant Neil Chandran waived service of a summons. (*See* ECF Doc. No. 8)
2. Chandran is a defendant in a parallel criminal proceeding pending in the U.S. District Court for the District of Nebraska (Case No. 22-cr-03077). The indictment was filed on June 14, 2022, and Chandran remains detained.
3. Plaintiff has been informed that Chandran is in the process of retaining counsel for this civil matter and seeks additional time for prospective counsel to enter an appearance and file a responsive pleading.

4. Defendant Garry Davidson was served with a summons and the Complaint on January 11, 2023. (*See* ECF Doc. No. 6) Davidson has similarly requested additional time to respond to the Complaint while seeking to retain counsel.

5. Plaintiff agrees to a limited extension to permit these parties additional time to retain counsel and respond to the Complaint.

6. Thus, Plaintiff stipulates, and has no objection, to an extended answer deadline of April 6, 2023, for Defendants Chandran and Davidson, subject to Court approval, including via text order.

Dated: March 10, 2023

Respectfully Submitted,

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION**

s/Michael D. Foster

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CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2023, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Michigan by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants of record.

s/ Michael D. Foster